



*Lake Cuyamaca* RECREATION AND PARK DISTRICT

July 20, 2006

Mr. John H. Robertus  
Executive Officer  
California Regional Water Quality Control Board  
San Diego Region  
9174 Sky Park Court, Suite 100  
San Diego, California 92123-4340

Re: Revised Monitoring Well Plan  
Monitoring and Reporting Program No. R9-2004-0015  
Lake Cuyamaca Recreation and Park District Septic Tank/Leach Field System  
SCR: 07-0097.01

Dear Mr. Robertus:

This letter presents a revised monitoring well plan for the Lake Cuyamaca Recreation and Park District (District) septic tank/leach field system.

**Background.** Regional Board Order No. R9-2004-0015 establishes requirements for the proposed discharge of effluent to a septic tank/leach field system near Lake Cuyamaca. The septic tank/leach field system would serve District facilities at Lake Cuyamaca, which include a restaurant, campground restrooms, and a fish cleaning station. The proposed discharge site is located within the Cuyamaca Hydrologic Subarea (HSA 907.43).

Requirement "E" of Monitoring and Reporting Program No. R9-2004-0015 establishes the following requirement for the submittal of an initial monitoring well program:

**E. Monitoring Wells**

*The discharger shall submit an initial monitoring well plan to the Regional Board within 30 days of adoption of this Order. The initial monitoring well plan shall include, but not be limited to, the number, location, and depth of monitoring wells. Monitoring wells shall be installed to groundwater depth to verify compliance with the limitations specified in Section B. Performance Requirements and the Basin Plan groundwater quality objectives. The initial monitoring well plan shall contain at least 3 monitoring wells to determine flow direction and compliance; two wells down gradient of the subsurface disposal leach field infiltration system and one well up gradient to assess background concentration. The plan shall clearly identify which wells are proposed as compliance monitoring wells.*

*These wells shall be located down gradient of the subsurface disposal leach field system(s). The monitoring well plan is subject to approval by the Regional Board.*

After consultation with Regional Board staff, the District developed and submitted to the Regional Board an initial monitoring well plan. This initial monitoring well plan included the three following monitoring wells:

- MW-1, a shallow monitoring well (proposed as a compliance well) located approximately 800 feet south and downgradient from the leach field site,
- MW-2, a shallow monitoring well located immediately downgradient from the leach field site, and
- MW-3, a shallow monitoring well (originally a deeper well, but subsequently filled in) located approximately 500 feet north and upgradient from the leach field site.

A revised Monitoring Well Plan was submitted on December 2, 2005. The revised plan proposed the extension of monitoring wells to a depth of 200 to 250 feet in order to provide monitoring information through a larger component of the groundwater regime located near the proposed discharge.

The Regional Board reviewed the District's requested and denied the revised plan in a letter dated February 27, 2006. The denial was based on concern the extended depth of monitoring wells would provide monitoring data of ground water impacted by the proposed discharge.

This letter provides a refined discussion of the proposed Monitoring Well Plan as envisioned in December 2, 2005 letter.

The District understands the need to monitor groundwater that is receiving the proposed discharge from the leach field system. In order to achieve this result, the revised plan would include the following elements:

- Construct a fourth monitoring well.
- Monitoring Well No. 4 would be provided with a screened casing for the full depth of the well with the exception of the near surface section that would be provided with an annular seal in accordance with County of San Diego monitoring well regulations.
- Monitoring Well No. 4 would be extended to a depth that is common in the Lake Cuyamaca area for water supply wells (approximately 200 feet).
- Monitoring Well No. 4 would provide groundwater data that represents groundwater over a broader portion of the groundwater regime in the vicinity of the proposed discharge.
- The existing monitoring wells would remain and would provide information on the near surface groundwater quality.

- Placement of a new monitoring well would be determined after completing a review of the geology of the site, expected movement of groundwater at the proposed discharge site.

The revised Monitoring Well Plan has been developed as discussed in a meeting held with staff on July 12, 2006 and offers the following benefits:

- Samples obtained from the four proposed monitoring wells that are in contact with near surface groundwater and deeper groundwater will provide information on the proposed discharge within a larger portion of the hydrologic unit.
- Monitoring Well No. 4 will provide information on the impact to groundwater that is being beneficially used by local residents and the visiting public.
- Monitoring Well No. 4 will serve as the ability to determine the impacts associated with the proposed discharge as it will not be affected by factors other than the discharge.

The later point is noted considering the fluctuating water quality that has been observed in Monitoring Well Nos 1, 2 and 3 since monitoring began in those wells shortly after their construction in 2003. The monitoring data indicates changes in quality in the absence of any nearby discharge of pollutants. Groundwater collected from Monitoring Well No. 4 will provide samples that are not as readily impacted by changes in near surface groundwater quality.

The attached figure presents the location of the monitoring wells and the location of the constructed septic tank/leach field disposal system.

The revised monitoring plan presented in this letter has been developed in consultation with Michael R. Welch PhD., P.E, Consulting Engineer and Matt A. Tebbetts P.E. with Kennedy/Jenks Consultants.

The District requests your approval of the revised monitoring program. Under the proposed revised monitoring well plan, the District (after your approval of the monitoring plan) would extend the depth of the monitoring wells and collect water quality samples. On the basis of the collected water quality data, the District would prepare and submit a compliance report to the Regional Board that documents proposed District actions to insure compliance with Basin Plan groundwater quality objectives and requirements set forth in Order No. R9-2004-0015. Depending on the results of groundwater quality monitoring from the monitoring wells, this compliance plan may include well head treatment of the local potable supply to insure compliance with the requirements of Order No. R9-2004-0015.

Proposed Revised Monitoring Well Plan  
Order No. R9-2004-0015  
Lake Cuyamaca Recreation and Park District  
July 20, 2006  
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Please call me if you have any questions about the District's proposed revised monitoring program. We would appreciate the opportunity to meet with you to discuss the proposed monitoring well plan and inspect the monitoring well sites.

Thank you for your consideration.

Sincerely,

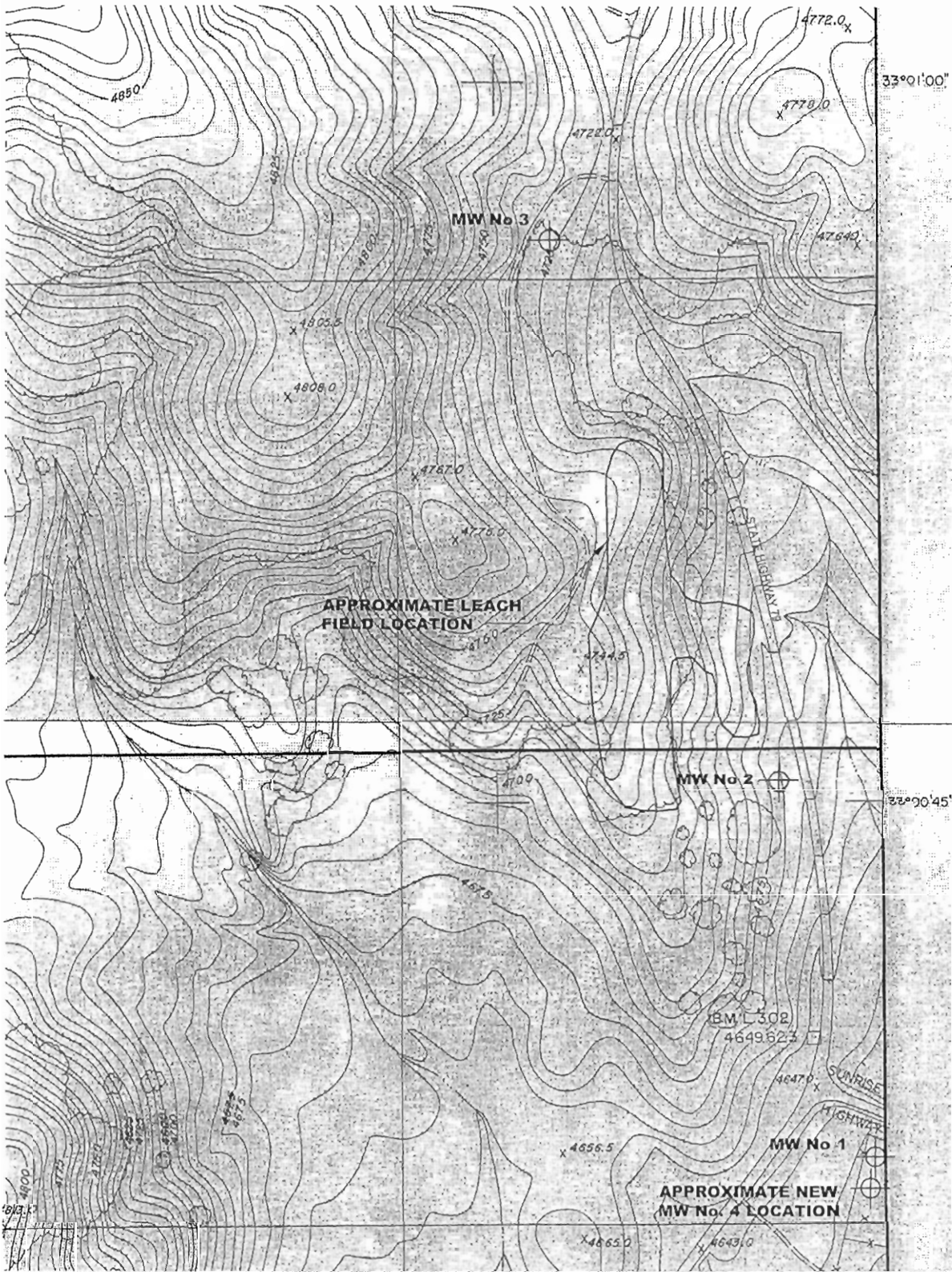


Thomas H. Chapman  
Chairman

for

Attachment: Monitoring Well Site Plan (Kennedy/Jenks Consultants)

cc Mark Weston, General Manager, Helix Water District  
Michael R. Welch, Consulting Engineer  
Matt A. Tebbetts, Kennedy/Jenks Consultants



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Kennedy/Jenks Consultants

LAKE CUYAMACA  
PARK AND RECREATION DISTRICT

Wastewater Infiltration  
Disposal System

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7.20.06

Monitoring Well Site Plan